

Woodhouse College Safeguarding Policy

Introduction and statutory guidance	2
Designated safeguarding staff	3
Awareness of abuse	4
Identifying a safeguarding concern	6
Reporting a safeguarding concern	8
Awareness of specific safeguarding issues	13
Managing allegations against staff	22
Practising safer recruitment	28
Establishing a safe environment	30
Annual review of safeguarding policy	32
Appendices:	
Appendix 1: Other relevant policies, legislation and guidance documents	34
Appendix 2: Managing a verbal disclosure	36
Appendix 3: Emergency contacts	37
Appendix 4: Risk assessment pro forma	38
Appendix 5: Responsibilities of Safeguarding Team	40

Introduction and statutory guidance

Safeguarding is everyone's responsibility

The College has designated safeguarding staff that have particular responsibilities. However, Working Together to Safeguard Children (July 2018) outlines that safeguarding is everyone's responsibility and everyone who works with children has a responsibility to keep them safe. All professionals at Woodhouse College recognise that safeguarding is everyone's responsibility irrespective of the role they undertake, or whether their role has direct contact or responsibility for students or not.

Students at Woodhouse College are between the ages of 16 and 19. Students who are under the age of 18 are legally classed as children, and those aged 18 are legally classed as adults. The College has a duty of care to all students, and we will be alert to all possible forms of abuse, and will not discount any allegation. Safeguarding includes any action taken to promote and protect a student's general wellbeing and welfare regardless of their age. Woodhouse College is committed to providing a secure environment for students, where students feel safe.

Students under 18 (ages 16 or 17)

Students who are aged 16 or 17 are classed as children in the eyes of the law. In safeguarding terms, a child under 18 may require 'early help', which involves providing support as soon as a problem emerges, to prevent the problem escalating or reaching crisis point. Providing early help is more effective in promoting the welfare of children than reacting later. Everyone has a duty to protect children under 18 from four types of abuse: sexual, physical, emotional abuse and neglect. In some cases, a child under 18 may be deemed 'a child in need' who requires provision of local authority services (section 17 of the Children Act 1989); or they may need 'child protection' if there is reasonable cause to suspect they are suffering or likely to suffer significant harm (section 47 of the Children Act 1989).

Adult students (ages 18 or 19)

An adult at risk of abuse or neglect (formerly referred to as a vulnerable adult) is defined as someone who has needs for care and support, who is experiencing or at risk of abuse or neglect, and as a result of their care needs is unable to protect themselves (The Care Act 2014). Safeguarding includes protecting adults at risk from 11 different types of abuse: self-neglect, domestic abuse, exploitation, discrimination, physical, financial, sexual, emotional and organisational abuse, neglect and modern slavery.

Vulnerable Students

Staff must be mindful of students who are; looked after children (LAC), care leavers, living independently, young carers, young parents, transgender, transitioning from male-to-female or female-to-male, and students who have special educational needs and/or disabilities. Staff help the Safeguarding Team to identify, monitor and support these students through their time at the College. Student Services can assist students who are eligible for bursary applications and free school meals. The College has a thriving LGBTQA+ Society called Spectrum, led by students, who meet for weekly discussions, attend events, and work on awareness raising campaigns and resources.

Statutory guidance:

Working Together to Safeguard Children - A guide to inter-agency working to safeguard and promote the welfare of children (The Department for Education July 2018)

One of the key principles of this statutory guidance is that safeguarding is everyone's responsibility.

Keeping Children Safe in Education (The Department for Education September 2018)

It is mandatory for every staff member to read Part 1 & Annex A of this document, which gives statutory guidance for schools and colleges.

Section 26 of the Counter Terrorism and Security Act (2015) The safeguarding of our students and staff is closely allied with the national 'Prevent' agenda. The Prevent Duty requires us to have "due regard to the need to prevent people from being drawn into terrorism".

Please see appendix 2 for relevant policies, legislation and guidance documents.

Designated Safeguarding Staff

Woodhouse College has designated staff with particular responsibilities for safeguarding, including a Safeguarding Governor, Designated Safeguarding Lead, two Safeguarding Officers, four Senior Tutors and Additional Learning Support Co-ordinator. The Designated Safeguarding Lead is Rebecca Sharp who oversees all safeguarding at the College: she is part-time in the summer term 2019. The two Safeguarding Officers, Lucy Tobin Howard and Ally Hillier, manage the majority of the safeguarding cases with assistance from other members of the Safeguarding Team. All eight members of the College (on site) Safeguarding Team receive advanced safeguarding training and Prevent training at least every two years.

Safeguarding Governor	Delia Goldring	safeguardinggovernor@woodhouse.ac.uk	
Designated Safeguarding Lead and Director of Student Services	Rebecca Sharp	safeguarding@woodhouse.ac.uk	
Safeguarding Officer	Lucy Tobin Howard	lthoward@woodhouse.ac.uk	Ext 212
Deputy Safeguarding Officer	Ally Hillier	ahillier@woodhouse.ac.uk	Ext 214
Four Senior Tutors	Kevin Lawrence Catherine Snoad Sophie Durant Zoe Micklewright	klawrence@woodhouse.ac.uk csnoad@woodhouse.ac.uk sdurant@woodhouse.ac.uk zmicklewright@woodhouse.ac.uk	Ext 223 / 279 Ext 260 / 275 Ext 223 / 275
Additional Learning Support (ALS) Coordinator	Kellie Sayers	ksayers@woodhouse.ac.uk	Ext 265

Awareness of abuse

It is essential that all staff have a basic awareness of the four categories of abuse (please see definitions below). Every staff member at Woodhouse College will complete mandatory safeguarding training every 3 years. Members of the Safeguarding Team will complete mandatory advanced safeguarding training every 2 years, with regular updates at least annually.

Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a student. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a student. (This used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a student such as to cause severe and persistent adverse effects on the student's emotional development. It may involve conveying to a student that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the student opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on students. These may include interactions that are beyond a student's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the student participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing students frequently to feel frightened or in danger, or the exploitation or corruption of students. Some level of emotional abuse is involved in all types of maltreatment of a student, although it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the student is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving students in looking at, or in the production of, sexual images, watching sexual activities, encouraging students to behave in sexually inappropriate ways, or grooming a student in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Neglect

Neglect is the persistent failure to meet a student's basic physical and/or psychological needs, likely to result in the serious impairment of the student's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a student from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a student's basic emotional needs.

Definitions taken from Keeping Children Safe in Education Part 1: Information for all school and college staff (September 2018)

Please refer to the non-statutory guidance document: 'What to do if you're worried a child is being abused' March 2015 (Woodle / staff area / safeguarding / safeguarding policies).

Identifying a safeguarding concern

Guidance for staff

Every single staff member has a duty to help safeguard students. This means identifying students who are in need of support or at risk of harm and sharing concerns with the Safeguarding Team in a prompt manner. Staff are best placed to notice changes in a student's behaviour. Staff need to maintain a **professional curiosity**, which means looking beyond a student's educational needs and being alert to underlying safeguarding concerns. The identification of a safeguarding issue may arise through witnessing or observing a worrying behaviour or incident; or receiving a verbal disclosure from a student; or hearing something worrying or receiving a concerning email from a student..

Please see appendix 2: Managing a verbal disclosure.

An example of a 'concern' might be that a student, who is usually happy and sociable, is now frequently presenting as withdrawn and very low in mood, and they are missing lessons on a regular basis. It would be important to share this concern with the Safeguarding Team.

Some students may be 'at risk of significant harm' or 'in immediate danger'

If any student aged 16-19 makes a disclosure about suicidal thoughts, honour based violence, domestic violence, forced marriage or FGM (female genital mutilation), this needs to be shared with the Safeguarding Team as a matter of urgency.

Note regarding FGM: if any staff member hears a student who is currently aged under 18 disclose that they have experienced FGM, that staff member* has a personal and mandatory duty under the Serious Crime Act 2015 to report this to police via calling 101, in addition to informing the Safeguarding Team. (*This applies to teachers or persons employed or engaged to carry out teaching work). Always inform the Safeguarding Team.

Child protection

Child protection relates to cases where a child under 18 is suffering or at risk of suffering significant harm. As an example, if a student aged 16 or 17 discloses that they (or their younger siblings) are experiencing domestic violence at home, the Safeguarding Team will contact Children's Social Services who may offer child protection support. Please note that 'child protection' is only one aspect of safeguarding.

Indicators / signs and symptoms of abuse and neglect

Staff should be vigilant noticing any marked changes in a student's behaviour.

It is vital that staff are aware of the range of behavioural indicators of abuse. The identification of physical signs is complicated, as students may go to great lengths to hide any injuries, perhaps because they are ashamed, embarrassed or fearful. Individual indicators will rarely provide conclusive evidence of abuse; each indicator should be viewed as part of a jigsaw, with each small piece of information helping to build a bigger picture. A student who is experiencing abuse, neglect or exploitation may:

- have bruises, bleeding, burns, fractures or other injuries*
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing to engage in sport

- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss college or arrive late or leave the College for part of the day**
- show signs of not wanting to go home
- display a change in behaviour (e.g. from quiet to aggressive, or happy-go-lucky to withdrawn)
- challenge authority
- become disinterested in their College work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about, drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'
- go to the toilet often or find it hard to go to the toilet due to FGM injuries.

* It is essential to record the date and time of the observation, and a description of the injury. At no time should a member of staff take photographic evidence of any injuries or marks to a student's person, or ask for clothing to be removed in order to see an injury or mark. The College has 18 staff members trained as first aiders. Call the Office (reception) on Ext 666 if a first aider is required, giving the name of the casualty, the location and the nature of the incident. If an ambulance is required, the Office ONLY should call the emergency services.

** If a member of staff notices that a student is missing without explanation, and/or they know the student is travelling to a regional zone of concern for an extended period, they must alert the attendance office and Safeguarding Team. In some cases, this may indicate a forced marriage or FGM, which will need reporting to the local authority.

Reporting a safeguarding concern

How do parents, governors and members of the public report a safeguarding concern?

Please share any safeguarding concern(s) with the College Safeguarding Team by sending an email to safeguarding@woodhouse.ac.uk. The Designated Safeguarding Lead and Safeguarding Officers will receive your email. Alternatively, please speak to a member of the Safeguarding Team (see page 3 for contact details).

How do staff report a safeguarding concern?

Staff must document any safeguarding concerns on a Sharing Concerns Form via Dashboard. It is essential that staff record everything in writing within 24 hours and preferably before the end of the day. This form is located on Woodle / Staff Area / Safeguarding / Reporting a concern.

If there is an immediate risk of harm, staff should contact the DSL (Ext 254), Safeguarding Officer (Ext 212) or Deputy Safeguarding Officer (Ext 214) and complete documentation afterwards, within 24 hours.

Note: if a student currently under the age of 18 discloses they have experienced FGM, the individual staff member has a legal personal duty under the Serious Crime Act 2015, to call the police via 101.

If the student has any visible or alleged injuries, and they require first aid or medical attention, this must take priority. Staff must not ask to see injuries concealed beneath clothes or take a photo, but can record a written description of any visible injuries. Staff should ask reception (Ext 666) if a first aider or ambulance is required.

Early help

Naturally, staff should aim to provide support as soon as a problem emerges, to prevent the problem escalating or reaching crisis point. Providing early help is more effective in promoting the welfare of a student than reacting later.

HOW DO STAFF REPORT A SAFEGUARDING CONCERN?

IDENTIFY
A safeguarding concern



DOCUMENT & SHARE INFORMATION

Complete a 'Sharing Concerns Form'
On Dashboard **within 24 hours**

(Via Learner Support Module, Safeguarding Category, Create a Sharing Concerns Form)

Unless FGM call 101 and then tell the Safeguarding Team

You will receive a notification on Dashboard from the Safeguarding Team acknowledging receipt of your Sharing Concerns Form.

Emergency contacts

Legally, any member of staff can make a referral to an outside agency, but as a rule, our Safeguarding Officers will take responsibility for making all referrals to external agencies. If staff should ever find themselves in the very unlikely position where all members of the Safeguarding Team are absent, and a referral to Children's Social Services or the police is required, please refer to **Appendix 3: Emergency Contacts**

What does the SHARING CONCERNS FORM look like?

For use by any staff member who has concerns about a young person's welfare, wellbeing or safety. Please describe your concerns below, giving as much detail as possible. If you have received a verbal disclosure, use the student's words. Distinguish between fact, the student's perspective, and your professional opinion. Please record how the student presents, any immediate action taken, any contact with parents, and details of any current support the student is receiving in or outside college. All information will help to build a full picture of the student's circumstances.

<p>Student's name:</p> <p>Age:</p> <p>Personal Tutor:</p> <p>Senior Tutor:</p> <p>Name of staff who observed a concern or received a verbal disclosure:</p>
<p>What are you worried about?</p>
<p>Date and time of incident / observation / verbal disclosure:</p>
<p>Do you feel this is urgent or non-urgent? (Please state urgent/non-urgent):</p>
<p>On a scale of 0 to 10, where 10 is the highest level of danger and 0 is the welfare is good, how would you rate your level of concern?</p>
<p>Has the student requested counselling? (Please state YES or NO):</p>
<p>Note: please do not contact parent(s) if there is a domestic violence, FGM, or honour based violence issue. If you know of any reason not to contact parent(s), please indicate this on the form.</p> <p>The expectation is that a Sharing Concerns Form is completed and submitted on Dashboard. However, if you do not have access to Dashboard, please email this form to the college Safeguarding Officers: safeguarding@woodhouse.ac.uk</p>

Safeguarding Team action on receipt of a safeguarding concern

In most cases, one of the Safeguarding Officers (or another member of the Safeguarding Team) will respond to the safeguarding concern by arranging to meet with the student to explore the concern. Usually, the Safeguarding Team will decide to:

- Monitor the student's welfare by meeting with them from time to time.
- Offer a referral to the College Counsellors, who work on site four days per week and offer each student 6 - 12 free and confidential counselling sessions.
- Refer or signpost the student to external support services, helplines and websites. The Safeguarding Team can refer and signpost students to a very wide range of services, including mental health services, sexual health clinics, drug and alcohol services, NHS therapy services, bereavement services etc.

The Safeguarding Officers work closely with external agencies, often liaising with Safer Schools Police Officers, Social Workers, and therapists at CAMHS (Children and Adolescent Mental Health Services), in order to safeguard students and ensure they get care that best meets their needs.

If a child/student under 18 is suffering, or is likely to suffer, from significant harm

The Safeguarding Team may seek advice from Children's Social Care in the borough where the student resides (see appendix 3 for contact details of Children's Social Care in different boroughs). Where there are serious concerns about a student under 18, the Safeguarding Officers will make a referral to Children's Social Services. A child under 18 may require 'early help'; or be deemed 'a child in need' requiring provision of local authority services (section 17 of the Children Act 1989). They may need 'child protection' if there is reasonable cause to suspect they are suffering or likely to suffer significant harm (section 47 of the Children Act 1989).

In the event of a decision to make a referral, the Safeguarding Team will try to ensure that the student is aware of the proposed action and the reasons for this decision. Ideally, the student's agreement will be obtained and recorded. However, when there is a risk of significant harm to a student under 18, although it is good practice to make a referral with the student's knowledge, it can be done either with or without their consent. Social Care should acknowledge any referral within one working day.

Legally, any staff member can make a referral to Social Care. However, the College prefers for referrals to be made by the Safeguarding Officers. If neither is available, any member of the College Safeguarding Team can take responsibility for making the referral. If staff should ever find themselves in the very unlikely position where all members of the Safeguarding Team are absent, and a referral to Children's Social Services or the police is required, please refer to Appendix 3: Emergency Contacts.

Keeping records

Every concern about a student, even concerns that do not lead to a referral, will be kept on record in the student's file, within the safeguarding drive. Access to the safeguarding drive is limited to members of the Safeguarding Team. Safeguarding records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of concerns about any individuals and ensuring these are acted upon.

Parental/Carer involvement

It will be determined what is appropriate in terms of communication with the student's family. The College will always encourage any student to confide in their parent(s) or carers about any safeguarding concerns unless there is a safeguarding reason not to, and the student's decision will usually be respected. Students who are aged 16 and over will usually have capacity and competency to consent to decisions about their care, without parental involvement, and to participate in making informed judgements about family involvement.

In some circumstances, a student's views about not informing their parent(s) will be tested against advice given by statutory agencies. If a student is known to be feeling actively suicidal, parents/carers will be informed. If a student is subject to FGM, domestic violence or honour based violence, parents/carers will not be informed if it will put the student at further risk of harm. The College will take advice from Social Care or Police in such cases, regarding sharing information with parents.

Awareness of specific safeguarding issues

It is important that all staff have a basic awareness of specific safeguarding issues, described here and in Keeping Children Safe in Education (September 2018). Each staff member has a responsibility to help identify students who are experiencing safeguarding issues, and a duty of care to ensure that these concerns are reported to the Safeguarding Team, so the student can receive appropriate support.

It is the responsibility of staff to report their concerns; not to investigate or decide whether a student has been abused. A staff member does not need 'absolute proof' that a student is at risk. If a staff member has any concerns about a student, or a member of the college community, this information must be shared with the College Safeguarding team within 24 hours. No single professional can have a full picture of a student's needs and circumstances, and if students and families are to receive the right help at the right time, everyone has a role to play in identifying concerns, sharing information and taking prompt action.

Always maintain a professional curiosity, which means looking beyond a student's educational needs and being alert to underlying safeguarding issues.

Bullying

Bullying, although not defined legally, is described as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient. Bullying may be physical (e.g. assault), verbal (e.g. malicious gossip, unwelcome remarks, threats, or abusive language referring to a person's gender, ethnicity, culture, age, disability, sexuality, religion or personal appearance), or non-verbal (e.g. intimidation, offensive gestures or imagery, exclusion from social activities).

Cyber-bullying is the sending or posting of harmful or cruel/unwelcome texts or images using digital communication devices. This could also include: picture or video clips via mobile phone cameras, abusive mobile phone calls, silent calls or stealing someone's phone and using it to harass others to make them believe the victim is responsible, emails, chat room bullying, instant messaging via websites, comments and images posted on networking sites.

For definitions of bullying including cyber bullying, harassment and peer-to-peer abuse, please refer to Woodhouse College's Bullying, Harassment and Peer-to-Peer abuse policy.

Child sexual exploitation (CSE)

A type of sexual abuse where a young person under 18 is coerced or forced into sexual activity. The manipulation or 'grooming' process initially involves befriending (or targeting) a young person under 18, either in person or online. Trust is built, and often gifts are bought for the young person so that they feel cared for and believe that the abuser is their friend, or that they are in a loving and consensual relationship. In time, after being groomed, the young person is coerced or forced into sexual activity which may include humiliating, degrading or violent acts. CSE is defined by exchange; the young person receives gifts, money, alcohol, affection, drugs, accommodation, friendship, or status in return for sexual activity. Often the victim does not recognize they are being exploited. CSE can occur online, with a young person befriended and then coerced into sending sexually explicit images via a webcam or smart phone. The abuser may threaten to forward these images to family and friends, unless further images or payment are sent.

Keeping Children Safe in Education (September 2018) defines CSE as a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce,

manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology. Please see Keeping Children Safe in Education Part 1 for further detail.

The following vulnerabilities can be a risk factor: a history of abuse, recent bereavement or loss, being a young carer, having links to gang members, low self-esteem, difficulties at home, being in or leaving care, having a disability. Children under 18 who go missing are known to be at risk of CSE. Possible indicators that a young person is being sexually exploited include going missing, having unexplained gifts, associations with gang members, mood swings, sexually transmitted infections or pregnancy, inappropriate sexualised behaviour, drug and alcohol misuse. Under 18s can report CSE to police online via CEOP (Child Exploitation and Online Protection). CEOP keeps children safe from sexual abuse and grooming online.

Child criminal exploitation: county lines – drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Domestic abuse or violence

Controlling, coercive, threatening behaviour by a partner, ex-partner, or family member that makes a person frightened and fearful. It can be a one-off incident, or a pattern of ongoing incidents. Domestic violence includes FGM, so-called ‘honour-based’ violence, stalking, and forced marriage (further details below). Domestic abuse can be physical, psychological, sexual, financial or emotional. To gain a further understanding of domestic abuse behaviours please search online for the Power and Control Wheel. If a child under 18 is exposed to domestic violence in the home, this must be reported to Social Care (even if they do not witness violence, they will still be impacted by either sensing or hearing it). Intervention is needed to stop the abuse or violence intensifying and escalating. Risk of harm can be higher if there is a pregnant woman (risk to the woman and unborn baby), a baby under the age of one, a disabled child under 18, or a person without mental capacity in the home; or when there are substance misuse and mental health issues in addition to domestic violence (known as a toxic trio). Domestic abuse affecting young people can also occur within their personal relationships, as well as at home.

Drugs

If a student is misusing drugs or alcohol, they may present as intoxicated, lacking in focus or motivation, or there may be an odour of cannabis or alcohol. The College has links with a local young people’s drug and alcohol service, which offers one-to-one confidential support to any student who wishes to address, reduce or stop their misuse.

Exploitation

The deliberate manipulation and maltreatment of another person. It can include sexual exploitation, human trafficking, forced labour and slavery.

Fabricated or induced illness

A form of child abuse (formerly referred to as Munchausen Syndrome by Proxy) where a parent or carer deliberately exaggerates or causes symptoms of illness in a child. A parent or carer may fabricate signs, symptoms and past medical history; or falsify hospital charts, records, letters, documents and specimens; or induce illness by a variety of means.

Faith abuse

The mistreatment of a person by someone who claims a spiritual authority, and can include practices around 'spirit possession' and 'witchcraft'. A child may be accused of being a 'witch' or 'possessed by an evil spirit' and subsequently blamed for occurrences. For example, they may be treated as a scapegoat for financial difficulties at home, a disability, behavioural problems or illness. The abuser may attempt to 'exorcise' the victim of 'evil forces' via physical abuse. Victims of faith abuse can experience sexual, physical and psychological abuse or neglect, and may present as very withdrawn, distressed, with little sense of self-worth.

Female genital mutilation (FGM)

A form of child abuse and violence against women. It involves the partial or total removal of the external female genitalia, or other injury to the female genital organs, for non-medical reasons. FGM is practised in up to 42 African countries, in parts of the Middle East and Asia, and it's estimated that over 20,000 girls are at risk of FGM in the UK. It is mostly carried out on girls between the ages of 5 and 8, but can be carried out during adolescence. The procedure is often conducted by an older female relative, who may come to visit the child in the UK, or whilst the child visits her family's country of origin (often during a summer holiday period). Other terms may be used to describe FGM such as 'sunna' or 'cut' or 'a special occasion to become a woman'. FGM causes significant psychological damage and a range of harmful long term physical complications. It is a serious criminal offence to carry out FGM in the UK, or to assist FGM being carried out on a UK resident overseas (Female Genital Mutilation Act 2003) and carries a penalty of up to 14 years in prison. It should be noted that FGM includes genital piercing on under 18s.

Important note regarding FGM: If a student who is currently aged 16 or 17 discloses they have already suffered FGM, the staff member has a legal and personal duty to report this crime immediately to police via 101 (FGM Act 2003 and Serious Crime Act 2015). This mandatory reporting duty was placed on teachers and teaching staff since 31 October 2015. If the student is aged 18 or 19, this duty does not apply, though the Safeguarding Team will offer support and ascertain whether any other children in the family (younger sisters, nieces or cousins) may be at risk. If somebody else (e.g. a friend or parent) discloses that a student under 18 has already experienced FGM, a referral to Social Care will be made. If a student is deemed to be at risk of FGM, Social Care will be contacted or the police via 999 if risk is imminent.

Forced marriage

A forced marriage is one that is entered into without a student's free and full consent. It is not the same as an arranged marriage; where both partners aged 16 or older freely consent. A female or male can be forced into marriage by parents, other relatives or a religious leader; with coercion, emotional blackmail (e.g. being told they will bring shame on the family or be disowned by the family), threats or physical violence. Every year at least 250 UK residents are forced into a marriage against their will. Motivations behind forced marriage include:

- Protecting 'family honour'
- Financial gain - ensuring land, property and wealth remain within the family
- Wanting to follow misguided cultural, traditional or religious ideals
- Ensuring future care for a bride or groom who has special needs
- Assisting claims for residence and citizenship
- To conceal a child's true sexuality
- To stop relationships or sex occurring outside marriage

Forced marriage is a crime and a violation of human rights, regardless of cultural expectations, and it is illegal in the UK. Taking someone overseas to force them to marry (whether or not the forced

marriage takes place), or marrying someone who lacks the mental capacity to consent to the marriage (for example a student with learning difficulties, whether they are pressured to or not) carries a sentence of up to seven years in prison. If a student is at risk of forced marriage, staff will seek advice from the Forced Marriage Unit (020 7008 0151 / fmu@fco.gov.uk) or call 999 if the risk is imminent.

Gangs and youth violence

A gang is a street-based group of young people for whom criminal activity and violence is integral to their identity. Possible risk factors include offending behaviour (such as robbery, buying or selling cannabis, possessing a knife or weapon), difficulties at home and going missing, having associations with gang members (e.g. a friend or older sibling is already involved in a gang), or living in an area of deprivation. Students who become involved in gang activity may be attracted to a sense of belonging, excitement, power, protection and status. However, they will be vulnerable to witnessing and experiencing intimidation, violence (e.g. stabbings), emotional and physical harm; both from the gang they become affiliated with and also as a result of conflict with rival gangs. Female students who become involved in gangs may initially be groomed and eventually become victims of sexual exploitation and sexual violence (sexual assault or rape, sometimes by multiple perpetrators) and /or coerced into criminal activity (such as robbery, carrying drugs or weapons).

So-called 'honour based' abuse or violence

Honour based abuse or violence is carried out to protect or defend the 'honour' of a family or community. Victims are often females who are punished for 'bringing shame' on the family (for example, by dating a partner from a different culture, having an interfaith relationship, wearing certain clothes, becoming immersed in western culture, becoming pregnant outside marriage, rejecting an arranged or forced marriage). Males can be victims too (if, as an example, they identify as homosexual or gay). Honour based violence is a form of domestic violence; it is often carried out or arranged by male family members with the support of female relatives. It can include crimes such as forced marriage, FGM, violence including murder (known as 'honour killings'), and practices such as breast ironing.

Mental health

There are a number of mental health conditions (for example, depression, anxiety disorders, eating disorders, personality and mood disorders) which can at times make studying difficult, and may have safeguarding implications (a student may disclose suicidal thoughts or self-harming behaviour). Some students disclose mental health difficulties at enrolment which allows the College to support them from the beginning. The College offers free counselling to all students, and the Safeguarding Team can make referrals to mental health support services as and when needed.

Missing

Students aged 16 are of compulsory school age. Children under 18 who go missing, particularly repeatedly, can act as a vital warning sign that there may be a safeguarding issue, such as sexual exploitation, criminal exploitation, mental health difficulties, substance misuse, risk of female genital mutilation, forced marriage or travelling to conflict zones. If a student is deemed to be missing for an extended period without explanation, the Safeguarding Team can share information with the local authority.

Private fostering

This is when a child under 16 years old is looked after, for 28 days or more, by someone who is not their parent, step-parent, legal guardian, grandparent, sibling, biological aunt or uncle. The college does not have students under 16, but if a student under 18 has a disability and is being privately fostered for 28 days or more, by law this arrangement must be registered with Children's Social

Care. A Social Worker would carry out an assessment to ensure the young person is being well cared for and offer support to the carer.

Preventing radicalisation

PREVENT is part of the British counter-terrorism strategy (CONTEST). Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on us to have "due regard to the need to prevent people from being drawn into terrorism". This is the Prevent Duty. Extremism and radicalization are safeguarding issues for children and adults:

Extremism The Government describes extremism as vocal or active opposition to fundamental British values and may include calls for the death of members of the British armed forces. A student may be exposed to far-right, Islamic, animal rights or environmental extremist views. People who hold extremist views can be violent or non-violent; they may or may not participate in terrorist activity. The concern would be if a student with extremist views acts or intends to act in a way that harms themselves or other people, or if their mental health is being affected in a negative way.

Radicalisation is the process whereby a person of any age is 'groomed' into adopting extremist ideologies. Radicalization can sometimes occur online via social media and the internet, with exposure to extremist material and propaganda that can seem seductive. Or a person can be groomed face-to-face by someone known to them who is targeting and influencing them. Some young people may be more vulnerable to radicalization due to personal circumstances. A person who is radicalised into adopting extremist views may act or intend to act in a way that harms themselves or other people, or become involved with criminal activity or terrorist organizations, or join conflict zones abroad. Radicalization is a safeguarding matter. If a child under 18 is being radicalized, they are deemed to be in need and at risk of harm (Working Together to Safeguard Children 2015). A young person aged 18 or older would also need to be offered support, in case they put themselves or somebody else in danger. This is because extremism and radicalization can lead to terrorist activity.

There is no single way of identifying a student who is susceptible to extremism and radicalization. Students may be vulnerable if they are:

- experiencing an identity crisis, seeking a sense of belonging
- experiencing feelings of unmet aspirations or a sense of injustice
- desiring excitement, adventure and a sense of danger
- holding a pre-existing conviction that their religion or culture is under threat
- feeling socially isolated, possibly suffering from depression
- experiencing loss, bereavement, family breakdown
- experiencing discrimination, inequality, a sense of grievance
- in contact with a family member or friend who holds extremist views / is already radicalised
- already involved in criminal activity
- with special educational needs, mental health issues, alcohol or drug misuse

Identifying young people who are being radicalised and taking steps to protect them is essential safeguarding work. A student with extremist views may seek to hide these views, or they may be open about their views. As with managing other safeguarding risks, staff must be alert to any marked changes in a student's behaviour. Staff must be vigilant and maintain a professional curiosity. Some potential indicators may include:

- a change in dress, friendship group, behaviour, beliefs
- secretive use of social media

- advocating extremist messages, and holding onto these views when challenged
- becoming isolated from friends or family
- graffiti, symbols or artwork promoting extremist messages
- accessing extremist material online
- voicing extremist views or support for extremist ideologies
- expressing intolerant views and disrespect towards those who share a different religious or political view
- use of extremist or hate terms to exclude others or incite violence
- glorifying or sympathising with acts of terrorism

The Prevent Duty urges us to safeguard students from extremism and radicalisation, in the same way that we would safeguard students experiencing other safeguarding issues, such as domestic violence or sexual abuse. Staff must share all Prevent related concerns with the Safeguarding Team via a Sharing Concerns Form. Parents and members of the public can share any concerns via safeguarding@woodhouse.ac.uk. Staff can also refer to the College Whistleblowing Policy.

The Safeguarding Team work in partnership with, and take advice from Barnet MASH (Multi Agency Safeguarding Hub), the Barnet Prevent Coordinator (currently Sam Rosengard), Barnet Prevent Education Officer (currently Perryn Jasper), and Prevent Police Officers at Colindale Police Station. When appropriate, the Barnet Prevent Coordinator may recommend a referral to the Channel Programme, which focuses on providing support at an early stage to people identified as being vulnerable to being drawn into terrorism.

WRAP training (Workshop to Raise Awareness of Prevent) will be organised for all staff every 3 years, and members of the College Safeguarding Team will have WRAP training at least every 2 years.

British Values

The influence of positive, protective factors can give a young person resilience to reject extremist ideology. We can build students' resilience to radicalisation by promoting fundamental British values and creating a safe space to challenge extremist views and discuss controversial issues.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this. It can equip young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way.

Students receive information via assemblies and tutorials regarding fake news, online resilience, critical thinking, British Values and online safety. The College's 'Visiting Speakers Policy' requires all speakers to be risk assessed, have an enhanced DBS check or be supervised at all times, to protect our students and mitigate any potential risk of radicalisation. The College has two ICT filtering systems, which prevent access to extremist materials and flag up any Prevent related concerns.

There are three main objectives to the Prevent Strategy:

- Challenging the ideology that supports terrorism and those who promote it
- Protecting vulnerable people.
- Working in partnership with sectors and institutions where there are risks of radicalisation.

We welcome students of all or no faiths through a balanced curriculum that promotes both College and British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and a fair, open and inclusive admissions process.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and where appropriate, dealt with in line with our Code of Conduct for Students, Bullying, harassment and peer-on-peer abuse policy for students and the Code of Conduct for staff.

Teaching Approaches

We ensure that all of our teaching approaches help our students to build resilience generally and to extremism and give them a positive sense of identity through the development of critical thinking skills.

We teach and encourage pupils to respect one another and to respect and tolerate difference, especially those of a different faith or no faith. It is our responsibility to keep our students safe and to prepare them for life in modern multi-cultural Britain.

Therefore, by adhering to safer recruitment best practice techniques and by ensuring that there is an ongoing culture of vigilance within our College and staff team we will minimise the opportunities for extremist views to prevail.

Peer on peer abuse

Peer-on-peer abuse usually occurs between young people who are aged under 18 but anyone who is a student in our College community may be affected. It can take many forms, and examples of peer-on-peer abuse may include, but are not limited to:

- **Domestic abuse** – young people who experience physical, emotional, sexual and/or financial abuse, and coercive control, within their intimate relationships.
- **Child sexual exploitation** – young people who are sexually abused in the context of exploitative relationships, contexts and situations, by another young person(s).
- Serious youth violence – crime (e.g. wounding with intent, rape, murder and grievous bodily harm).
- **Harmful sexual behaviour** – such as sexting, sexual violence, rape, sexual assault, sexual harassment
- **Bullying** (including cyberbullying)
- **Physical abuse** - such as hitting, kicking or otherwise causing physical harm

Controlling and abusive behaviour may occur between two students who are in a close, intimate relationship. There may be physical violence (pinching, hitting, pushing, shoving, slapping, punching, kicking); controlling behaviours (checking a partner's phone and emails, telling them what to wear, dictating who they can or cannot speak to, checking up on a partner all the time, keeping them away from friends and family); emotional and verbal abuse (making threats, belittling, name calling, shaming, bullying); sexual abuse (sexual assault, rape, not respecting the concept of consent within a sexual relationship, threatening to spread rumours if a partner refuses to have sex, or pressurizing a partner to engage in sexting); stalking (a pattern of harassment causing fear in the victim). All of these behaviours are abusive and harmful.

Self-harm

When a student deliberately hurts or injures themselves. Self-harming behaviour may include:

- cutting or burning (the most common forms of self-harm)
- taking an overdose of tablets or medicines
- hitting oneself or throwing the body against something
- pulling out hair or eyelashes
- scratching, picking or tearing at the skin
- inhaling or sniffing harmful substances
- swallowing things that are not edible
- inserting objects into the body

Self-harm isn't usually a suicide attempt or a cry for attention. Instead, it's often a way for a young person to release overwhelming emotions. Some young people self-harm on a regular basis, while others self-harm just once or several times. Sometimes self-harming is a way of releasing tension and coping with a specific problem, but once that problem passes the self-harming stops. Sometimes self-harming behaviour can continue for years as a way of coping with stresses, pressures and overwhelming feelings. Self-harm can also be used as self-punishment or to gain a sense of control. The physical pain caused by self-harming can be a temporary distraction from feeling emotional pain, though it can bring on feelings of guilt, shame or self-loathing afterwards. It is important to explore the problems that make a young person want to hurt themselves and offer support.

Sexting

The sending and receiving of sexually explicit pictures, text messages or videos, either via mobile phones or the internet. The creating, sharing and forwarding of such images may be done in a consensual way between friends or partners who want to express their sexuality. However, it is illegal if anyone under the age of 18 is involved, and this includes taking or sharing 'selfies' that are nude or 'underwear shots'. The law aims to protect young people from feeling pressurized or coerced into sending sexual images. It is also illegal for a sexual image of an adult student aged 18 or 19 to be shared without their consent. The college can support and safeguard students affected by sexting.

Sexual violence and sexual harassment

Sexual violence refers to rape, assault by penetration, or sexual assault (Sexual Offences Act 2003). Sexual harassment refers to 'unwanted conduct of a sexual nature' that can occur online and offline. The College will undertake a risk assessment following a report of sexual violence, and consider safeguarding both the victim and the alleged perpetrator, supported by other agencies such as Social Services or Police. <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Trafficking

Child trafficking involves the recruitment and transportation of a child into the UK from abroad, or from one part of the UK to another. A child may be trafficked for sexual exploitation, forced marriage, forced labour, criminal activity or domestic servitude (e.g. excessive levels of household chores or caring for younger children). Unaccompanied migrant or asylum seeking children who go missing could potentially be victims of trafficking. Traffickers may use grooming techniques to gain the trust of a child, and may even promise the child's family a better life or education in another place. A child may be trafficked by an individual, a family member, or a network of traffickers. Child trafficking is the movement of a child for the purpose of exploitation, and it is a criminal offence under Modern Slavery legislation.

Violence against women and girls (VAWG)

Violence directed specifically against females, and it can occur within an intimate relationship or within the family or community.

VAWG includes:

- domestic abuse and violence
- intimate partner violence (including marital rape, sexual violence, and dowry related violence)
- honour based violence (including FGM and forced marriage)
- stalking
- gang-related violence
- sexual abuse of female children in the household
- trafficking of girls and women

Men and boys can also be victims of gender based violence and abuse.

Important safeguarding principles

The welfare of any student is paramount; young people are entitled to protection from abuse and exploitation. Always maintain a professional curiosity, which means looking beyond a student's educational needs and paying attention to underlying safeguarding issues.

Any allegations of abuse, or suspicions of abuse, need to be taken seriously, and handled in a sensitive manner. Individual members of staff must never deal with child abuse disclosures (or suspicions) in isolation; they must always share information with, and refer the matter to, the Safeguarding Team.

Early help is vital to avoid a situation escalating or reaching crisis point, so it is important to respond and offer support promptly. No member of staff should guarantee 'total confidentiality' in matters of safeguarding; the best interests of a student can override the principle of confidentiality. A young person can be assured that communication regarding the case will be kept to a minimum, on a strictly 'need to know' basis.

Young people have a right to be kept fully informed about what is happening to them and their families, and a right to make important decisions about their own lives. Therefore, there are occasions where an instant response may not be in the best interests of the young person concerned, so it is important to apply the guidelines with sensitivity to the individual circumstances of the student and their family.

Managing allegations against staff

References to 'staff' in this process include all part-time and full-time staff employed at the College, all senior management, teachers, contractors, volunteers, casual staff, agency staff, paid or unpaid.

The law

It is an offence for an adult aged 18 or older, who is in a position of trust, to have a sexual relationship with a child under 18, even if the relationship is consensual (The Sexual Offences Act 2003). All staff working at Woodhouse College are in a position of trust and therefore any sexual relationship with a student under 18 would be illegal.

Staff code of conduct

It is unethical and against the staff code of conduct for any staff member to have a relationship with an adult student who is aged 18 or 19. Staff should act towards all students as 'in loco parentis' or as a reasonable parent. Staff should take care to behave with professionalism in dealings with students, and should never be friends or followers of students on social media, offer private tuition, or offer to give a student a lift in their car. In summary, staff should avoid putting themselves or students in a potentially vulnerable situation where allegations may arise. Please refer to the staff code of conduct (Woodle/staff area/safeguarding/ safeguarding induction/staff code of conduct).

Where there are concerns, suspicions, or allegations about a staff member's behaviour

Staff should notify the Principal, who will seek advice from Barnet's Designated Officer (DO previously known as LADO) within one working day if there is a concern that a staff member has:

- behaved towards a young person in a way that indicates he/she would pose a risk of harm if they work with young people regularly or closely
- behaved in a way that has harmed or may have harmed a young person
- Possibly committed a criminal offence against or related to a young person

These criteria relate to behaviour that takes place either on College grounds or off College grounds. Any allegation that meets one of these criteria must be reported to the Designated Officer via the MASH (Multi Agency Safeguarding Hub) within one working day. Please refer to the College's

How to report concerns about an adult working with young people?

IDENTIFY

A concern about an adult who works with young people



DOCUMENT & SHARE INFORMATION

Record your concern(s) in writing
Share it with the Principal
(If concern relates to Principal - share your written record with the
College Safeguarding Governor, Delia Goldring)



Principal will contact Barnet's Designated Officer
(DO previously known as LADO)
Via Barnet MASH 0208 359 4066
within one working day
Barnet's DO will advise the Principal on how to proceed
(If concern relates to Principal - the Safeguarding Governor will contact
Barnet's DO within one working day)

Whistle blowing procedures

- Please see the College Whistle blowing Policy (Woodle/ staff area /safeguarding /safeguarding policies/whistle blowing policy).
- Staff can also share concerns about colleagues or the Senior Leadership Team, or concerns about how a safeguarding concern is being handled in the College, via the **NSPCC Whistleblowing Advice Line [0800 028 0285](tel:08000280285)** which offers free advice and support to professionals.

Reporting a concern or allegation

The person reporting the allegation should write a dated and timed note of what has been disclosed or observed. This written report should be passed immediately to the Principal. Copies of this written report concerning the allegation must be sent to the Designated Officer (DO formerly known as LADO) on the same day. The DO will provide guidance and advise the Principal if the allegation needs to be reported to any other relevant agency.

If the allegation is against the Principal, a written report should go to the Safeguarding Governor who must notify the DO (formerly known as LADO) on the same day.

The DO must be notified within one day and will be involved from the initial phase of the allegation through to the conclusion of the case, providing the College with information, guidance and advice about how best to proceed.

Initial discussion with the Designated Officer (DO formerly known as LADO)

An initial confidential discussion must take place immediately between the DO and the Principal and/or Safeguarding Governor to:

- Share what information is available
- Identify what other information might be needed
- Come to a view on the seriousness of the allegation
- Consider whether the alleged perpetrator should continue working or remain in contact with students
- Consider whether suspension is appropriate
- Consider whether the member of staff should be informed of the allegation at this stage
- Agree a course of action and whether Social Care or Police involvement is necessary
- Decide who needs to be involved and informed
- Note: If the allegation is against the Principal, the Vice-Principal will attend this meeting, and information / advice will be received by the Safeguarding Governor.

At this stage, discussion between the DO, the Principal and/or Safeguarding Governor should be confidential, and any other individual staff member(s) should be included in discussions only on a strictly need to know basis, or until an allegation has been substantiated.

The staff member should be informed about the allegation as soon as possible. Efforts should be made to minimise their stress by explaining what will happen next and signposting to support (e.g. staff counselling service, Trade Union, a named colleague to keep in contact with about the progress of the case). However, if it is decided that liaison with Police or Social Care is needed, these agencies should be consulted regarding how much information should be shared with the staff member

facing the allegation. The parents/carers of the student should also be informed of the allegation and the outcome, unless the Police or Social Care are involved and advise otherwise. The DO will also advise the College about how best to proceed.

Strategy Meeting

The DO may convene a strategy meeting with Social Care and the Police. This would be appropriate if it is deemed that a student under the age of 18 is suffering or at risk of suffering significant harm, or a criminal offence has taken place. In some cases, the DO may advise the College to take disciplinary action rather than involve the Police or Social Care, depending on the circumstances.

Possible action that can be taken:

- **Police investigation into a possible criminal offence** - the staff member may be cautioned, charged, convicted, or investigated with no action taken.
- **Enquiries and assessment by Children's Social Care** - this will happen if a student under 18 is deemed to be suffering or at risk of suffering significant harm.
- **Disciplinary action by the College** - If an allegation does not involve a criminal offence and the student does not require input or protection from Children's Social Care, the DO may advise the College to follow Disciplinary Procedures (see the College's Disciplinary Procedures Policy). The staff member, student and their parent/carer must be kept informed of the progress and outcome of any disciplinary action, including during any suspension period. At the end of this process the staff member may return to work, be transferred, be dismissed due to gross misconduct, or choose to leave.

Note: The College may choose to suspend a staff member, in which case they should be informed in writing, with a named contact and support provided to them. However, suspension should not be an automatic response to an allegation, or viewed as a disciplinary penalty, and options to avoid suspension should be creatively explored.

Possible outcomes:

Keeping Children Safe in Education 2018 outlines four possible outcomes in allegation investigations:

- **Malicious:** there is sufficient evidence to disprove the allegation and a deliberate act to deceive. If an allegation is deemed 'malicious' the case should be resolved within one week and the written record should be removed from the staff member's personnel records. The College should consult Social Care about any student who has made a malicious allegation of abuse, and also consider whether disciplinary action is appropriate for the student who made the allegation (police can be consulted about any non-student who has made a malicious allegation).
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term does not imply guilt or innocence. The College should consult with Social Care about any student who has made an unsubstantiated allegation of abuse.
- **Substantiated:** there is sufficient evidence to prove the allegation.
- **False:** there is sufficient evidence to disprove the allegation.

Records

For all allegation outcomes (excluding malicious ones), records must be kept on the staff member's confidential personnel file, with a copy given to the staff member. Records should include a summary of the allegation, how it was followed up and resolved, actions taken, and decisions reached. These records should provide clarification and be retained until the staff member reaches

pensionable age (or for 10 years after the allegation). Regarding references, any allegations that are proven to be malicious, false or unsubstantiated should not be included in employer references.

In cases where no further action is needed, the reasons for coming to this decision should be documented in writing. If the staff member facing the allegation declines to co-operate in any investigation, a conclusion should still be reached and the outcome documented. Consideration should be given to what action should follow, in terms of the staff member facing the allegation and the person who made the allegation.

Should the Principal or Safeguarding Governor leave their post, the Chair of Governors should ensure that records relating to allegations about staff are passed on to the successor. Should a member of staff who has had concerns or allegations raised about them leave the College to work elsewhere, the Principal will consider the question of passing the concerns to the new employer/authority. If allegations concerned the Principal, the Safeguarding Governor should consider this.

If a staff member facing an allegation chooses to resign or ceases to provide their services

This outcome must not prevent an allegation being followed up and resolved. 'Compromise agreements' - whereby a person agrees to resign, the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference - must not be used in these cases (NSPCC). The College has a legal duty to make a report to the DBS in substantiated cases where a staff member has harmed, or poses a risk of harm, to a child or vulnerable adult.

Referral to DBS

If an allegation relates to a risk of harm, or actual harm, to a child under 18, a referral should be made to the Disclosure and Barring Service (DBS). Employers in organisations working with children have a legal duty under The Safeguarding Vulnerable Groups Act (SVGA) 2006 (England and Wales) to make a referral to the DBS, in cases where they have dismissed or removed a person from working with children or vulnerable adults (or may/would have if the person had not left or resigned) because of concerns over their behaviour (NSPCC). There must be procedures in place to make a referral to the DBS if a staff member has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. This is a legal duty and failure to refer is a criminal offence (Keeping Children Safe in Education).

Reporting to the Teaching Regulation Agency

Allegations of serious misconduct against a teacher must be referred to the Teaching Regulation Agency (TRA) in cases where the alleged misconduct is so serious that it warrants a decision on whether the teacher should be prevented from teaching with a prohibition order. Making a referral in cases of serious professional misconduct is a statutory duty. When a teacher is dismissed for serious misconduct, or would have been dismissed had they not resigned, such cases should be referred to both the TRA and DBS, who will consider both the misconduct and safeguarding aspects of the case.

Reporting to ESFA

The Education and Skills Funding Agency (ESFA) has included new safeguarding clauses in the funding agreements and contracts for 2017 to 2018. The Secretary of State (SoS) has a general duty to promote the wellbeing of children in England under section 7 of the Children and Young Persons Act 2008. ESFA's role is to provide assurance to the SoS that organizations are taking action to keep all pupils and students safe. The College must report cases where the institution itself, or one of its staff, is subject to a serious safeguarding investigation by the local authority or the police. In such circumstances, the Safeguarding Governor must email: Enquiries.EFA@education.gov.uk. ESFA will

need to know the name of the institution, the general nature of the safeguarding incident, and confirmation that a referral has been made and there is a current or pending investigation by the police or local authority.

Resolution

All cases of allegations are expected to be investigated and resolved within one month, or up to three months in some cases, or one year in exceptional circumstances, with ongoing input and guidance from the Designated Officer (DO). It is important for the College to reflect on learning and how to improve safer practice after managing such a case.

Practising safer recruitment

Please also refer to the Recruitment and Selection Policy (Woodle/staff area/college policies/human resources/recruitment and selection policy).

Safer recruitment procedures will ensure that every care is taken to see that students are protected from unsuitable people. The recruitment procedures will apply to all staff within the College who may work with young people or vulnerable adults. The recruitment procedures will include the following as is detailed in this policy:

- The post or role will be clearly defined.
- The College's commitment to safeguarding the needs and interests of young people will be clear in advertising materials.
- The key selection criteria for the post or role will be identified and will include criteria relating to the welfare of young people.
- A variety of selection techniques (e.g. qualifications, previous experience, interview and reference checks) will be used.
- HR staff will take part in 'Safer Recruitment' training.
- The requirement to produce documentary evidence of academic/vocational qualifications.
- Obtaining professional and character references including a judgement on the suitability to work with young people.
- Verification of previous employment history.
- Identity and employment checks (proof of address and eligibility to work in the UK)

Enhanced Disclosure and Barring Service (DBS) checks including barred list checks where appropriate; and where necessary referrals through the DBS, according to current legislative requirements. Where these checks are not complete prior to commencement, a risk assessment will be conducted and a standard risk assessment pro forma completed.

Single Central Record The College Personnel department will keep and maintain a single central record (SCR) of all staff (including agency or supply staff and volunteers). This record will include personal data (of internal staff only), details of identity checks, DBS checks, barred list checks (if relevant), prohibition checks, overseas checks where appropriate, any sanctions from member states of the EEA since January 2016 and relevant qualifications where appropriate. This record includes information such as dates that staff have undergone Safeguarding and Prevent training, identity checks, enhanced DBS checks, barred list checks, prohibition checks if relevant, and overseas checks where appropriate.

Employment checks will be undertaken to include evidence of a valid UK passport or full UK birth certificate and/or photo card driving licence; a valid EEA passport or EEA national ID card; proof of a national insurance number; evidence of a visa or right to work in the UK documentation from the Home Office if non-UK or EU citizen. Copies will be taken and kept in relevant personnel files. The copies will be signed and dated as evidence of having seen the original documents.

Risk assessment Where volunteers, members of external agencies or other people will be working or in contact with students, a risk assessment will be conducted by the Personnel Department in advance, to assess suitability and to confirm their identity. If they will have unsupervised access to students, an enhanced DBS and, where appropriate, a barred list check will be undertaken by the College if they do not already hold a valid DBS certificate. Alternatively, if such personnel are registered with the online DBS update service, an update to their suitability can be accessed through

this system, with their permission. The risk assessment will also determine any further safeguards that are required. The standard risk assessment pro forma will be used (see appendix 4).

Visitors will always be escorted on and off the premises and supervised by college staff at all times. DBS checks and identity are evidenced and recorded for all contracted staff such as canteen staff and cleaners on the SCR by the Personnel Department. Visitors must report to reception to sign in, be under supervision of college staff at all times, and have an escort back to reception to sign out when they leave. Visiting staff (e.g. volunteers) will meet a liaison at reception who will be aware of their time of arrival, sign in and present ID to prove who they are, and have an escort back to reception to sign out when they leave.

External speakers - SLT must first approve any external speakers invited in by staff. All student events (such as charity events and promotions in the social area) can only take place if approved in advance by SLT, in order to minimise the risks of radicalisation on College students and staff. External speakers are risk assessed and supervised at all times if they do not have a DBS in place. External speakers are required to complete an external speakers form in advance of the event (Woodle/staff area/college policies/other/visiting speakers policy).

Establishing a safe environment

The College aims to establish and maintain an environment where all students and staff feel safe and secure, via the following measures:

E Safe online filtering and monitoring system

The College has an external monitoring service in place called eSafe. It helps detect potential safeguarding risks. If a student or staff member is using a College computer or laptop, and they type in words perceived to be a safeguarding concern, eSafe will capture this. If the alert relates to a student, eSafe notifies the College Safeguarding Officers who will meet with the student to discuss the circumstances, assess for any safeguarding risks and offer appropriate support. The Principal (or Personnel) will address any eSafe alerts related to a staff member's use of a College computer or laptop. E Safe is in place to help create a safer environment for students and staff.

- **Internet safety** The College will ensure that students know about the risks associated in using the internet and mobile technologies, and that they have the understanding to safely use social networking sites. Safe practice will be promoted during the academic year, through tutorials and via on-line reputation assemblies with students. ICT policies and protocols will be regularly reviewed to incorporate the Prevent duty.
- **The Prevent Strategy** will inform the protective work we do to safeguard our students, visitors and members of staff.
- **External speakers** invited in by staff must be approved through SLT, and all student events (such as charity events and promotions in the social area) will only be allowed to take place if approved in advance by SLT, in order to minimize the risks of radicalisation of College students and staff.
- **Security** of the College site against intruders is a key priority.
- There are gates and barriers which require ID access in and out of the College premises; there are CCTV cameras around the entire College; students and staff wear lanyards to identify as part of the College community (students without ID should pay for a temporary day pass); there are stickers on the back of student and staff lanyards with information on how to report safeguarding concerns; and a student survey is undertaken each year to assess whether they feel safe in college.
- **Health and safety procedures** will be in place, monitored by the governors' audit committee and through internal audit, and self-assessed annually. The 'Seeking Assurance Visit' will provide further bench-marked judgements of the College's health and safety practices.
- **First aiders** The College has 18 staff members trained as first aiders. Staff will contact the Office (reception) on Ext 666 if a first aider or ambulance is required.
- **Procedures and policies** are in place to minimise bullying, harassment and peer-on-peer abuse, These will be publicised to students through assemblies, tutorials and student diaries.
- **Equal opportunities and the celebration of diversity** amongst students will be promoted, in order to create an environment of tolerance and respect.
- **Trips and visits are risk assessed** before they take place, in accordance with College procedure. This may cover travel to and from College, trips and visits off-site, work experience and other placements. Any student who has been identified as vulnerable will be individually risk-assessed in advance of any off-site activity.

- **Adequate risk assessments** are in place to meet the needs of those students identified as vulnerable. This may cover activity at College, travel to and from College, trips and visits off-site, work experience and other placements. The Safeguarding Team will carry out a risk assessment when there are allegations of peer-on-peer abuse.
- **Students can access free counselling** on site. We have two external counsellors (from Rephael House in Barnet) who work a total of four days per week in the College. Students can be referred via the Safeguarding Team.
- **A range of welfare services** is provided to students, including a counselling service, support around sexual health and financial issues, and tailored careers guidance. The College offers opportunities for sport and health and wellbeing too.
- **Awareness of safety issues** - the College will provide opportunities via assemblies and the tutorial curriculum for students to develop awareness of how to keep safe (e.g. information on sexual health, online and personal safety, radicalisation, mental health and wellbeing).
- **Staff can access confidential counselling** from our Employee Assistance Programme (details are available in the Staff Dossier or from Personnel team).
- **Safe working practices** will be established through effective induction and risk assessments.
- **The student voice** The College will work proactively with student governors, with the Student Union and with tutor group representatives to ensure that the student voice is embedded throughout all areas of College activity, so that the interests and welfare of students can be prioritised.
- **Surveys** of students will take place regularly to assess the extent to which they feel safe at College.
- **Complaints policy** The College recognises that listening to young people is an important and essential part of safeguarding them against abuse and neglect. We will seek to ensure that any individual young person who makes a complaint is informed not only about the action the College will take, but also the length of time that will be required to resolve the complaint. The College's complaints policy will be published on the College website
- **Induction procedures** will cover how new staff members communicate electronically with students and the appropriate professional use of email, Twitter and Facebook. It will also cover how colleagues recognise and respond to extremist views which may be presented by staff or students. Staff will be made aware of the College's safeguarding procedures and the identity of the Safeguarding Officer. All new staff will meet the Safeguarding Officer as part of their induction, in order to ensure that their safeguarding responsibilities are absolutely clear.
- **Registers** - students missing lessons can be an indicator of safeguarding issues. Teaching staff are required to take a register during the appropriate lesson and usually at the start of each lesson.
- **Safeguarding training for staff** It is mandatory for every staff member at Woodhouse College to complete Safeguarding training and Prevent training once every 3 years. Members of the Safeguarding Team will receive advanced safeguarding training and Prevent training once every 2 years. All staff will receive annual refresher training / updates.
- **Review of any serious or major safeguarding incidents** Members of the Safeguarding Team and relevant senior staff will meet to reflect on the incident, to review what happened, and identify any learning points, with a view to improving safer practice for the future.

Annual review of safeguarding policy

- The Designated Safeguarding Lead, Safeguarding Officer and governing body will undertake an annual review of the College safeguarding policy. The College will ensure that its procedures are in line with those set out by Barnet Local Safeguarding Partnership and take account of guidance issued by the Department for Education (DfE), government websites, and other relevant safeguarding bodies and communities (such as NSPCC). The College will maintain an ongoing vigilance and awareness of national and local developments, with the aim of updating this policy in light of changes in the external legal and policy environment. (See appendix 5 for information on responsibilities of the Safeguarding Team).
- Reviewed November 2018
- Next review November 2019

Appendices

Appendix 1:

Other relevant policies, legislation and guidance documents

College Policies

1. Equality and Diversity Policy
2. Health and Safety Policies & Procedures
3. Risk Assessment documentation, including visits and trips
4. Student Harassment Policy
5. Student Code of Conduct
6. Recruitment and Selection Policy
7. Prevent Strategy
8. Bullying, harassment and peer-on-peer abuse policy
9. Staff code of conduct
10. Staff Handbook
11. College Disciplinary Procedure
12. Complaints Procedure
13. Whistleblowing Policy
14. Social Media and Online Safety Policy
15. Quiet Room Policy

Safeguarding legislation

- Children Act (1989) & Children Act (2004)
- Education Act (2002) section 175 & Education Act (2011)
- Female Genital Mutilation Act (2003) and Serious Crime Act (2015)
- The Care Act (2014)
- The Safeguarding Vulnerable Groups Act (2006)
- The Sexual Offences Act (2003)
- Section 26 of the Counter Terrorism and Security Act (2015)
- Keeping Children Safe in Education (2018)
- Prevent Duty Guidance (2015)
- Working Together to Safeguard Children (2018)

Guidance documents

- **Barnet Local Safeguarding Partnership** outlines the child protection policies and procedures to be followed in this borough <https://thebarnetscp.org.uk/bscp>
- **What to do if you're worried a child is being abused (March 2015)** Produced by the government which helps staff identify child abuse: <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
- **Sexual violence and sexual harassment between children in schools and colleges** <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

- **Dealing with Allegations of Abuse against Teachers and Other Staff (2012)**
<https://www.gov.uk/government/publications/allegations-of-abuse-against-teachers-and-non-teaching-staff>
- **Teaching approaches that help build resilience to extremism among young people**
DfE 2011.
- The government published more detailed advice on [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#) in December 2017.

Appendix 2: Managing a verbal disclosure

Explain confidentiality

If a student begins to make a verbal disclosure to you, it is important to explain the confidentiality policy at this point. Make it clear to the student that if they tell you something that really worries you, or makes you feel concerned about their safety and welfare; you will need to share this information with the Safeguarding Team. Ensure that the student understands you cannot promise confidentiality.

Listen

Listen carefully and attentively, to be sure that you understand what the student is telling you. Use gentle probing with open questions (e.g. “what happened next?”) and avoid making assumptions or asking leading questions, which put words into the student’s mouth. Do not rush the student, and give them time to open up. If you do hear any allegations, the most important thing is to listen without judgement and take the student seriously. Note: if you find the disclosure to be particularly distressing, all staff can access confidential support from our Employee Assistance Programme (details are available in the Staff Dossier or from Personnel Manager Lydia Antoni).

Express your concerns

Reassure the student that by telling you, they have done the right thing. Show empathy and demonstrate a non-judgemental manner. Be transparent with the student about what your concerns are, and that you will need to share with the College Safeguarding Team what has been discussed. Explain that the Safeguarding Team will consider the student’s circumstances and make a decision about how to help and support them.

Respect the student’s privacy

Young people want to be respected, their views to be heard, to have stable relationships with professionals built on trust and to have consistent support provided for their individual needs. Please respect the student’s confidentiality by only discussing what you have heard with the Safeguarding Officer or other members of the Safeguarding Team. Sharing information with any staff member outside the Safeguarding Team must only ever be on a strictly ‘need to know’ basis, or with the student’s consent. The exception here is FGM where any member of staff can call 101.

Appendix 3: Emergency Contacts

Are you worried about a child aged under 18?

The College Safeguarding Team will take responsibility for making all referrals to external agencies. However, if staff should ever find themselves in the very unlikely position where all members of the College Safeguarding Team are absent, and there are significant concerns about a child's welfare and safety, here is a list of contact numbers for Children's Social Services. You will need to contact the service in the borough where the child resides. For example, if the child lives in Barnet, you will need to contact Barnet MASH and share your concerns over the phone:

Borough of Barnet
Multi-Agency Safeguarding Hub (MASH)
Tel: 0208 359 4066
Out of hours: 0208 359 2000

Borough of Brent
Brent Family Front Door
Tel: 0208 937 4300 (option 1)
Out of hours: 0208 863 5250

Borough of Camden
Children and Families Contact Service / MASH
Tel: 0207 974 3317
Out of hours: 0207 974 4444

Borough of Enfield
Children's Single Point of Entry (SPOE)
Tel: 0208 379 5555
Out of hours: 0208 379 1000 (select option 2)

Borough of Hackney
Hackney First Access Screening Team (FAST)
Tel: 0208 356 5500
Out of hours: 0208 356 5516

Borough of Haringey
Single Point of Access (SPA)
Tel: 0208 489 4470
Out of hours: 0208 489 0000

Borough of Islington
Children's Services Contact Team (CSCT)
Tel: 0207 527 7400
Out of hours: 0207 226 0992

Police

If you think a child is in immediate danger, or there is an emergency situation, you should call the police on 999. For non-emergencies, call the police on 101. The number for Barnet Safer Schools Police Officers is 0208 733 5857 (staff members can call weekdays 8am - 5pm during term time).

Appendix 4: Risk Assessment pro forma

Woodhouse College is committed to Safeguarding. Any member of staff responsible for or supervising a member of staff, mentor, volunteer or any other person working at the College or visiting must ensure the following form is completed and logged with the HR department.

For completion by staff liaison:

Name of person:	
Name of staff liaison:	
Nature of work:	
Will the person be supervised or non-supervised?	
Dates/times of work:	

For completion by HR Department:

Check carried out	Date	Signature	Comments
Existing enhanced DBS in place?			
Barred List check (List 99)			
CV supplied / application form supplied?			
Referees' names and contact details supplied?			
Emergency contact details supplied?			
Photo ID check / employment checks?			

In order for the named person to commence work prior to the vetting check being signed off as complete, the following provisions must be in place:

- Person must be in a supervised capacity if no existing or recent DBS check / barred list check available and approved by HR
- Person must sign in as a visitor and wear a visitor badge at all times (if not an employee)
- Person must have limited access to IT systems

To be completed by staff liaison:

I confirm that I can take responsibility for ensuring that the above person is supervised under the conditions which are stated above until I receive confirmation from HR that all vetting checks are complete.

Name: _____

Signature: _____

Date: _____

To be completed by HR Manager:

Having considered the above information, I confirm that this person **should/should not** be allowed to work on the College premises until their vetting check is complete. **(Please delete as appropriate)**

Name: _____

Signature: _____

Date: _____

Follow-up Action Points

Date	Notes	Initials

Appendix 5: Responsibilities of Safeguarding Team

The Safeguarding Team is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies as agreed with Barnet Safeguarding Children Board (BSCB)
- Making a referral to children's social care if it is believed that a student is suffering or is at risk of suffering significant harm. The student and the parents will be told that a referral is being made, unless to do so would increase the risk to the student.
- Providing advice and support to other staff on issues relating to safeguarding.
- Maintaining confidential records of any safeguarding concerns and /or referrals.
- Ensuring that parents of children and young people within the College are aware of the College's safeguarding and child protection procedures.
- Liaising with the Local Authority and London SCB and other appropriate agencies.
- Liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for the pupils.
- Liaising with employers and training organisations that receive children or young people from the College on long-term placements to ensure that appropriate safeguards are put in place.
- Ensuring that staff receive basic training in safeguarding and child protection issues and are aware of the College's safeguarding procedures, particularly new staff during their induction.
- Ensuring adequate risk assessment procedures are in place to meet the needs of those students identified as vulnerable.
- Providing an annual safeguarding report to the governing body of the College, setting out how the College has discharged its duties, and reporting deficiencies in procedure or policy.
- Ensuring that each year the governing body is informed of how the College and its staff have complied with the policy, including, but not limited to, a report on the training that staff have undertaken.
- Reviewing the safeguarding policy annually, and ensuring that the governing body reviews the safeguarding policy each year.
- Ensuring that the College has procedures and policies which are consistent with BSCB and the legal framework.
- The Safeguarding Officer will attend regular safeguarding training events, networks and conferences.
- The Vice Principal will receive bulletins from the Association of Colleges (AoC) and Sixth Form Colleges Association (SFCA) concerning changes and developments in practice and policy.
- The College will ensure that all members of staff understand their responsibilities in being alert to the signs of abuse and for referring any concerns to the Safeguarding Team.